

From: quinones.edwin@epa.gov
To: [Quinones, Edwin](#)
Subject: Reminder: You are under an obligation to preserve information (Litigation Hold)
Date: Monday, August 05, 2013 11:01:28 AM

You are a named custodian of potentially relevant information (PRI) subject to a litigation hold in the matter referred to below. Below is a copy of the original email that you previously received, and a link to the initial hold notice.

This a reminder that all EPA employees with possession, custody or control over any materials, whether paper, electronic, or otherwise, that are potentially relevant to this matter must continue to preserve those materials in accordance with the litigation hold instructions until further notice.

THIS IS A REMINDER -- YOU DO NOT NEED TO CLICK THE LINK BELOW OR RESPOND TO THIS MESSAGE. If you have questions regarding your obligation to preserve documents, please contact the case attorney below immediately.

Thank you for your assistance as we continue to implement this hold.

Good day,

We have identified you as an individual who may have responsive information for the U.S. v. Citgo Clean Water Act Litigation Discovery Production. Our list was developed from a list provided by Edwin Quinones, legal counsel assigned to this litigation.

While formal litigation hold instructions may not have been previously circulated for this litigation, you may have received previous informal litigation hold instructions on or after November 26, 2008. Since EPA has switched over to the new EnCase system this is a re-issuance of the original litigation hold. Accordingly, all Agency employees with possession, custody or control of any materials, whether paper, electronic, or tangible things, such as laboratory samples or other physical evidence, that are potentially relevant to this matter are directed to preserve those materials until further notice.

Please click the link below to view the entire litigation hold notice and questions pertaining to this matter. NOTE: You must be logged into the EPA Network to access this link.

We recognize that your time is valuable and appreciate your cooperation - the legal team is also expending considerable time and resources to support this matter and appreciates your continued support.

Failure to promptly respond to the questions found at the end of the litigation hold notice will result in automatic reminders to your email account until compliance is obtained.

DO NOT DELETE THIS EMAIL - YOU WILL NEED THIS LINK TO ACCESS THE



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LITIGATION HOLD NOTICE FOR FUTURE REFERENCE.

Thank you,

Jake

Please go to ["http://V18H1N-RELDB2/responses?Case='A6E1961F00FE6C43B21B40CE5BAFA920'&Guid='BB24C688FA13274FAD12780C621EA0FF'"](http://V18H1N-RELDB2/responses?Case='A6E1961F00FE6C43B21B40CE5BAFA920'&Guid='BB24C688FA13274FAD12780C621EA0FF') to accept notice.